



**AIG Canada**  
**Accessible Customer Service**  
**Policy**

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## **[1.] PURPOSE**

This AIG Canada Accessible Customer Service Policy (the “Policy”) is intended to meet the requirements of O. Reg. 191/11: *Integrated Accessibility Standards* (the “Accessibility Standards”) under the Ontario *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), as well as the Ontario *Human Rights Code* respecting non-discrimination.

The online customer-facing document that describes AIG Insurance Company of Canada’s (“AIG Canada” or the “Company”) policies, as required under the Accessibility Standards, is available as Appendix A to this Policy.

Defined terms in this Policy are capitalized and defined at the end of the document, *see* [Glossary](#).

## **[2.] SCOPE**

The requirements of this Policy apply to the provision of services to the public or other third parties by AIG Canada. All services provided by the Company shall follow the principles of dignity, independence, integration and equal opportunity of persons with disabilities.

This Policy applies to: (i) all employees of the Company; and (ii) all other persons, including contractors and their employees, who provide services on behalf of the Company, including when services occur off the premises of the Company.

## **[3.] POLICY STATEMENT AND REQUIREMENTS**

AIG Canada is committed to providing persons with disabilities every reasonable effort to be treated with respect for their dignity and independence. This includes providing a diverse, inclusive and barrier-free environment, resulting in an accessible organization for employees, customers, and qualified applicants by:

- giving people with disabilities the same opportunity to access the company’s insurance products and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers;
- ensuring that staff members are trained and are familiar with various assistive devices that may be used by customers with disabilities while accessing AIG Canada’s insurance products and services;
- making available documents related to the Accessibility Standard for Customer Service upon request to AIG Canada’s Ombudsman and in a format that takes into account the customer’s disability; and
- communicating with people with disabilities in ways that take into account the individual’s disability.

AIG Canada also strives to achieve a workplace for all employees that is free of discrimination on the basis of medical condition, physical disability or mental disability.

### **3.1 Service Principles**

The Company requires that all service procedures are consistent with the principles of dignity, independence, integration and equal opportunity of persons with disabilities by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways and at their own pace when accessing services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing services; and
- communicating in a manner that takes into account the individual's disability once it is made known.

### **3.2 Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing services provided by the Company. In cases where the assistive device presents a safety or system security concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

### **3.3 Communication**

The Company will communicate with people with disabilities in ways that take into account their disability. The Company's customers have several options available for them to give feedback. Feedback may be provided:

- in person at our office locations
- telephone/TTY (using a relay service)
- in writing
- by email; or
- by any other communication technology as reasonably required

If customers with disabilities would prefer to give their feedback, and receive a response to it, using an alternate method than the one offered, they may request it and the Company will endeavor to accommodate this request.

### **3.4 Use of Guide Dog, Service Dog, or other Service Animal**

A customer with a disability that is accompanied by guide dog, service dog or other service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. If a service animal is excluded by law from the premises, the Company will ensure that other measures

are available to enable a person with a disability to access the Company's products, services or facilities. "No pet" policies do not apply to guide dogs, service dogs or other service animals.

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the Company may request verification from the customer.

Verification may include:

- a letter from an applicable regulated health professional confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

The customer that is accompanied by a guide dog, service dog or service animal is responsible for maintaining care and control of the animal at all time.

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

### **3.5 Support Person**

If a customer with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

The Company will accommodate side-by-side seating for the customer and their support person.

The Company may require a customer with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the customer and considering the available evidence, the Company determines that: (i) a support person is necessary to protect the health or safety of the customer or the health or safety of others on the premises; and (ii) there is no other reasonable way to protect the health or safety of the customer and the health or safety of others on the premises.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed **in the presence of a support person.**

### **3.6 Notice of Disruption of Services**

Service disruptions to customers may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Company's services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted by the Company, the following information may be included unless it is not readily available or known:

- services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

When disruptions occur, the Company will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Company's website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

### **3.7 Customer Feedback**

The Company shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Company's website.

The Company must ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.

Customers who wish to provide feedback can do so by speaking to any employee or the Company's Ombudsman. If complaints are received, these will be addressed according to the procedure outlined in the Company's Complaint Resolution Policy.

### **3.8 Training**

Training about the matters covered by this Policy, including the purposes of AODA and the requirements of the Accessibility Standards, will be provided (as appropriate to their duties) to:

- all employees of the Company;
- all persons who participate in developing the Company's policies; and,
- all other persons, including contractors and their employees, which provide services on behalf of the Company.

All persons to whom training would be provided must be trained as soon as practicable.

Subsequent training will be provided as deemed necessary or in the event of material changes to legislation, procedures and/or practices.

The Company will keep a record of training that includes the dates on which the training is provided and the number of individuals to whom it is provided.

### **3.9 Notice of Availability and Format of Documents**

Upon request by a person with a disability and as required by law, the Company must provide or arrange for the provision of accessible formats and communication supports for persons with disabilities.

The provision of accessible formats and/or communication supports must be provided in a timely manner that takes into account the customer's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons (if any). The Company must consult with the person making the request in determining the suitability of an accessible format or communication support.

## **[4.] COMPLIANCE & EXCEPTIONS**

Requests for exceptions to this Policy must be sent to the policy document owner. No exception will be valid until the receipt of written approval of such exception.

Failure to comply with this Policy may be grounds for disciplinary action, up to and including termination.

## **[5.] CONTACT INFORMATION**

Questions relating to this Policy should be addressed to Policy Document Key Contact noted below. Employees may also ask questions, raise concerns or report instances of potential non-compliance with this Policy by contacting any of the following:

**AIG's Global Compliance Group** at 646-857-1877 or email at:  
[corporatelegalcompliance@aig.com](mailto:corporatelegalcompliance@aig.com).

**AIG Compliance Help Line** at 877-244-2210 or via Internet at:  
[www.aigcompliancehelpline.com](http://www.aigcompliancehelpline.com). Communications to the Help Line may be made anonymously, subject to local laws.

AIG prohibits retaliation against any Employee for making a good faith report of actual or suspected violations of laws, regulations, or this Policy.

## **[6.] RELATED INFORMATION**

- **Corresponding Policies, Standards, Procedures, or Guidelines**
  - [AIG Code of Conduct](#)
- **Forms / Appendices**
  - [Appendix A – AIG Canada Accessible Customer Service Policy \(External\)](#)

## [7.] GLOSSARY

For purposes of this Policy, the following definitions apply:

**American International Group, Inc. / AIG / Company** - These terms refer to American International Group, Inc. and its consolidated subsidiaries.

**Assistive Device** - is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**Disability** - is defined under the *Accessibility for Ontarians with Disabilities Act, 2005* as:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**Employee** - A full-time or part-time employee, eligible for some or all benefits and paid on AIG payroll. This includes internal agents and interns/trainees or apprentices who are paid on AIG payroll.

**Guide Dog** - is a highly-trained working dog that has been trained at one of the facilities listed in the Ontario Regulation 58, under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

**Guidelines** - Guidance or recommended best practices that: 1) support implementation or interpretation of policy requirements; or 2) address areas not covered by existing policy documents.

**Policy** - Formal statements of principles or rules that explain legal, regulatory and/or organizational requirements and that regulate organizational actions and employee conduct (what can and cannot be done, as well as what decisions or activities are appropriate).

**Procedures** - Steps (sequence of actions and instructions) necessary or that help to implement and/or support policy requirements.

**Service Animal** - is defined under the *Integrated Accessibility Standards*, Ontario Regulation 191/11 as an animal that satisfies one of the following conditions:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides documentation from an applicable regulated health professional confirming that the person requires the animal for reasons relating to the disability.

**Standards** - Detailed requirements that support a Policy, including what is required to comply/follow the principles or rules set out in a Policy.

**Support Person** - a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

### Key Policy Document Information:

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Version No.:	4.0	



## **[8.] APPENDIX A – EXTERNAL WEB SITE DOCUMENT – AIG CANADA ACCESSIBLE CUSTOMER SERVICE PROGRAM OVERVIEW**

### **Introduction**

AIG Insurance Company of Canada (“AIG Canada” or the “Company”) is committed to providing persons with disabilities every reasonable effort to be treated with respect for their dignity and independence. This includes providing a diverse, inclusive and barrier-free environment, resulting in an accessible organization for employees, customers, and qualified applicants

This AIG Canada Accessible Customer Service Program Overview provides a high-level overview of the policies and processes that AIG Canada has instituted to achieve accessibility and meet its obligations under applicable legislation, including the *Ontario Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”)

Upon request, AIG Canada will provide or arrange for the provision of this document in accessible formats and/or with communication supports for persons with disabilities. The Company will consult with the individual making the request in determining the suitability of an accessible format or communication support.

### **Service Principles**

The Company requires that all service procedures are consistent with the principles of dignity, independence, integration and equal opportunity of persons with disabilities.

### **Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing services provided by the Company. In cases where the assistive device presents a safety or system security concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services.

### **Communication**

The Company will communicate with people with disabilities in ways that take into account their disability. The Company’s customers have several options available for them to give feedback. Feedback may be provided:

- in person at our office locations
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- in writing
- by email; or
- by any other communication technology as reasonably required

If customers with disabilities would prefer to give their feedback, and receive a response to it, using an alternate method than the one offered, they may request it and the Company will endeavor to accommodate this request.

### **Use of Guide Dog, Service Dog, or other Service Animal**

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If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

### **Support Person**

If a customer with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

### **Notice of Disruption of Services**

Service disruptions to customers may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Company's services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

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When disruptions occur, the Company will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Company's website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

## **Customer Feedback**

AIG Canada views accessibility as an ongoing effort and is continually evaluating its policies, procedures, and processes, to ensure an inclusive experience for all users, regardless of ability.

Customers who wish to provide feedback on the way the Company provides its insurance products and services to people with disabilities may contact the Ombudsman. If complaints are received, these will be addressed according to the procedure outlined in the Company's [Complaint Resolution Policy](#). Please refer to the [Accessibility and Customer Satisfaction](#) page on AIG Canada's web site for more information regarding the feedback process.

## **Accessible formats and communication supports**

Upon request, the Company will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, including as part of the feedback process established above. Such accessible formats and/or communication supports will be provided in a timely manner that takes into account the customer's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons (if any). The Company will consult with the individual making the request in determining the suitability of an accessible format or communication support.

## **Training**

AIG Canada provides training to employees as soon as practicable upon joining the Company. Subsequent training is provided on an ongoing basis as deemed necessary and in the event of material changes to legislation, Company procedures and/or practices.

Among other considerations, training includes a review of Company policy, the purposes of AODA, the requirements of the *Integrated Accessibility Standards* regulation under AODA, and instruction about the following matters:

- interacting and communicating with persons with various types of disability;
- interacting with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
- using equipment or devices available on the Company's premises or otherwise provided by the Company that may help with the provision of goods, services or facilities to a person with a disability; and
- what to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

Training is also provided to other persons providing services on behalf of the Company, as appropriate to their duties and as required by legislation.